

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TRUMP FOR PRESIDENT, INC., *et al.*,  
Plaintiffs

v.

KATHY BOOCKVAR, in her capacity as  
Secretary of the Commonwealth of  
Pennsylvania, *et al.*,  
Defendants

No. 2:20-CV-0966-NR

*Complaint Filed 6/29/20*

Electronically Filed

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**MOTION FOR ADMISSION *PRO HAC VICE* OF KELI M. NEARY**

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Keli M. Neary, Executive Deputy Attorney General, hereby moves that she be admitted to appear and practice in this Court as counsel *pro hac vice* for Defendant Kathy Boockvar in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3 and respectfully submits the following:

1. Plaintiffs, Donald J. Trump for President, Inc., Glenn Thompson, Mike Kelly, John Joyce, Guy Reschenthaler, Republican National Committee, Melanie Stringhill Patterson, and Clayton David Show, have filed a complaint, naming Kathy Boockvar, the Secretary of the Commonwealth of Pennsylvania, and a number of other individuals and/or entities as Defendants.
2. Plaintiffs raise various constitutional challenges to the administration of the upcoming November general election.

3. The undersigned is the Executive Deputy Attorney General who will be assisting with the defense of this matter.
4. Pursuant to the requirements set forth in Local Rule 83.2, please find attached a declaration of Keli M. Neary certifying the undersigned is both a registered ECF user and familiar with the Local Rules of Court. *See Attachment 1.*
5. Also attached, is an Affidavit in Support of Motion for Admission *Pro Hac Vice*. *See Attachment 2.*

WHEREFORE, it is respectfully requested that Executive Deputy Attorney General Keli M. Neary be admitted to practice in the United States District Court for the Western District of Pennsylvania *pro hac vice*, for the purposes of the above-captioned case on behalf of Defendant Kathy Boockvar.

Respectfully submitted,

JOSH SHAPIRO  
Attorney General

/s/ Keli M. Neary  
KELI M. NEARY

Executive Deputy Attorney General  
Director, Civil Law Division  
PA ID 205178

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Civil Law Division  
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Date: July 8, 2020

### **CERTIFICATE OF SERVICE**

I, Keli M. Neary, Executive Deputy Attorney General, do hereby certify that I caused the foregoing **Motion for Admission *Pro Hac Vice* of Keli M. Neary**, to be filed with the United States District Court for the Western District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties of record.

*/s/ Keli M. Neary*

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KELI M. NEARY  
Executive Deputy Attorney General

DATE: July 8, 2020